



**Air Quality Permitting  
Technical Analysis**

**Permit to Construct:**

**Nos. 777-00034, 777-00147, 777-00148,  
777-00149, and 777-00150**

**STAKER & PARSONS CO. dba  
IDAHO CONCRETE CO.  
PORTABLE SOURCES**

**Prepared By:**

**Dustin Holloway  
Permit Writer**

**Project Nos.**

**P-020022A, P-020022B, P-020022C,  
P-020022D, and P-020022E**

**Date Prepared:**

**June 11, 2002**

**Permit Status:**

**FINAL**

## **PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho* for issuing permits to construct (PTC).

## **PROJECT DESCRIPTION**

Staker & Parsons Co., d.b.a. Idaho Concrete Co., Portable Sources (Idaho Concrete) is proposing to amend the following PTCs issued May 15, 1996:

- No. 777-00034
- No. 777-00147
- No. 777-00148
- No. 777-00149
- No. 777-00150

These concrete batch plants were recently purchased from Monroc Inc. There are no changes in operation associated with this amendment.

## **SUMMARY OF EVENTS**

On June 3, 2002, the Department of Environmental Quality (DEQ) received an application from Idaho Concrete for a name change on five concrete batch plant permits.

## **DISCUSSION**

### 1. **Process Description**

The process has not changed; there has only been a change in ownership. The equipment and method of operation have not changed and there are no changes in emissions.

### 2. **Emission Estimates and Modeling**

Emissions have not increased; therefore, no modeling was conducted for this amendment. For previous modeling, see the associated technical memorandums from the previous permits.

### 3. **Facility Classification**

These facilities are classified as natural minor "B" facilities, since their potential to emit is less than the following:

- 100 tons per year (T/yr) of any regulated pollutant
- 10 T/yr of any single hazardous air pollutant
- 25 T/yr of any combination of hazardous air pollutants

4. Area Classification

These are portable sources permitted to operate in any attainment or unclassifiable area in Idaho.

5. Regulatory Review

IDAPA 58.01.01.201                      Permit to Construct Required

These are not modifications since there is no change in emissions; therefore, a new PTC is not required.

6. AIRS Information

**AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM**

AIR PROGRAM	SIP <sup>c</sup>	PSD <sup>d</sup>	NSPS <sup>e</sup> (Part 60)	NESHAP <sup>f</sup> (Part 61)	MACT <sup>g</sup> (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO <sub>2</sub> <sup>h</sup>							
NO <sub>x</sub> <sup>i</sup>							
CO <sup>j</sup>							
PM <sub>10</sub> <sup>k</sup>	B						U
PT (Particulate) <sup>l</sup>							
VOC <sup>m</sup>							
THAP (Total HAPs) <sup>n</sup>							
			APPLICABLE SUBPART				

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant that is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

<sup>c</sup> State Implementation Plan

<sup>d</sup> Prevention of Significant Deterioration

<sup>e</sup> New Source Performance Standards

<sup>f</sup> National Emission Standards for Hazardous Air Pollutants

<sup>g</sup> Maximum Achievable Control Technology

<sup>h</sup> Sulfur Dioxide

<sup>i</sup> Nitrogen Oxides

<sup>j</sup> Carbon Monoxide

<sup>k</sup> Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

<sup>l</sup> Particulate Matter

<sup>m</sup> Volatile Organic Compounds

<sup>n</sup> Hazardous Air Pollutants

## **FEES**

The Idaho Concrete plants are not major facilities as defined in IDAPA 58.01.01.008.10. Therefore, registration fees are not applicable in accordance with IDAPA 58.01.01.527.

## **RECOMMENDATION**

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends Idaho Concrete be issued amended PTC Nos. 777-00034, 777-00149, 777-00148, 777-00147, and 777-00150 for the concrete batch plants. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

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cc: Steve VanZandt, Twin Falls Regional Office  
Sherry Davis, Technical Services  
Joan Lechtenberg, Air Quality Division  
Source File for PTC Nos. 777-00034, 777-00147, 777-00148, 777-00149, and 777-00150